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VIA ECF

Hon. Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007
(212) 805-6350
CaproniNYSDChambers@nysd.uscourts.gov

Re: *Syracuse Mountains Corp. v. Petróleos de Venezuela S.A.*, No. 1:21-cv-02684-VEC

Dear Judge Caproni:

We represent plaintiff Syracuse Mountains Corporation (“Syracuse”) and defendant Petróleos de Venezuela, S.A. (“PDVSA”) (collectively the “Parties”) in the above-referenced action. We write to request that this Court extend the deadline for the close of fact discovery in this case by sixty (60) days to March 1, 2023.

The original deadline for fact discovery in this case was February 9, 2022 [ECF No. 32], but that deadline was adjourned when the Court placed the case “on ice” on February 11, 2022 to allow PDVSA sufficient time to pursue foreign discovery requests. [ECF No. 65 at 13:1–8.] The Parties subsequently agreed in October 2022 to set a deadline of December 31, 2022 for the close of fact discovery, which the Court adopted in its October 17, 2022 Memo Endorsement. [ECF No. 93.] No other extensions of this deadline have been requested.

The Parties have both agreed to the requested extension in order to allow PDVSA to conduct follow-up discovery on new, responsive documents that were produced by Syracuse to PDVSA on December 12, 2022. The Parties expect that this follow-up discovery can be completed within the requested 60-day extension, and that no further extensions of the deadline for fact discovery will be necessary.

Respectfully submitted,

/s/ Daniel H. Weiner

/s/ Dennis H. Tracey

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